

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

SAMUEL HAYWOOD MILES,

Plaintiff,

v.

Case Number: 14-cv-661-bbc

UNITED STATES, RAVI GUPTA, and
CHRISTINA KANNEL,

Defendants.

**DEFENDANT KANNEL'S MOTION FOR SUMMARY JUDGMENT
PRIOR TO DISCOVERY**

Defendant Commander Christina Kannel, by her attorney, John W. Vaudreuil, United States Attorney for the Western District of Wisconsin, by Assistant United States Attorney Barbara L. Oswald, hereby submits this Motion for Summary Judgment pursuant to Fed. R. Civ. P. 56.

This Motion is supported by Defendant Kannel's Brief in Support of her Motion for Summary Judgment and the Declaration of Captain George Durgin. This Motion is also supported by Defendant Kannel's Proposed Findings of Fact in Support of her Motion for Summary Judgment Prior to Discovery.

Defendant Kannel requests that prior to discovery this Court enter Summary Judgment in her favor, dismissing Plaintiff's claim with prejudice.

Dated this 25th day of August, 2015.

Respectfully submitted,

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By:

s/ Barbara L. Oswald
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